

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION**

Bishara D. Braziel and Lamont George as  
Co-Personal Representatives of the Estate  
of D.S.G., a minor,

Plaintiffs,

vs.

NOVO Development Corporation d/b/a  
and a/k/a NOVO Properties,

Defendant.

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Civil Action No. 2:17-cv-03244-DCN

**Plaintiffs' Proposed Voir Dire**

1. Does any potential juror or your family member or close friend live at or ever lived at South Pointe Apartments in Hanahan, South Carolina?

2. Does any potential juror or your family member or close friend own a home or previously owned a home with a swimming pool?

If so, would such circumstances make you inclined to favor one side over the other in this lawsuit?

3. Does any potential juror or your family member or close friend live in a neighborhood, community, or apartment complex or previously lived in a neighborhood, community, or apartment complex with a swimming pool?

If so, would such circumstances make you inclined to favor one side over the other in this lawsuit?

4. Does any potential jury or your family member or close friend own, operate, or manage a swimming pool or previously owned, operated, or managed a swimming pool?

If so, would such circumstances make you inclined to favor one side over the other in this lawsuit.?

5. Has any potential juror had a family member or close friend die from drowning or be injured from a near drowning incident?

6. The Defendant in the lawsuit is NOVO Development Corporation d/b/a and a/k/a NOVO Properties. Is any potential juror or your family member or close friend currently employed by or ever been employed by this corporation?

If so, in what capacity?

7. Is any potential juror or your family member or close friend a Certified Pool Operator (CPO) or ever been a Certified Pool Operator (CPO)?

8. Is any potential juror or your family member or close friend employed by or ever been employed by a pool company?

If so, in what capacity?

9. Is any potential juror or your family member or close friend employed by or ever been employed by South Carolina DHEC (Department of Health and Environmental Control)?

If so, in what capacity?

10. The following persons may testify in this lawsuit – please inform the Court if you know any of these potential witnesses:

- a. Bishara Braziel
- b. Lamont George
- c. Cornelius Brown
- d. Brett Summers
- e. Pat Marr

- f. Luke Abel
- g. Ladawnya Braziel
- h. Kala Braziel
- i. Officer Ryan Burke
- j. Sgt. Travis Dodd
- k. Patrol Officer J. Teston
- l. Patrol Officer Callahan
- m. Patrol Officer W. Scott
- n. Lieutenant Cassandra Brooks
- o. Officer Pamela Diane Garlock
- p. Chief Dennis Turner
- q. Detective Sergeant Nelson
- r. Detective Flor Ramon Reyes
- s. Detective Ralph Clifton Driggers
- t. Corporal John Gombar
- u. Virginia L. Fowler
- v. Stanly Wojtalewicz
- w. Evan Seeley
- x. Michael Barger
- y. Dr. Bradley Marcus
- z. Alan Campbell
- aa. Dr. Deryn Strange

- bb. Sonya Cox a/k/a Sonya Wilson
- cc. Chad Daley
- dd. Philippine Rasonarina
- ee. Laura Silva
- ff. Arielle Mills
- gg. Britney Smalls
- hh. Katrina Hernandez
- ii. John McNellage
- jj. Kianna Mills
- kk. Lakisha V. Brown Crawford
- ll. Richard W. Watts

11. Does any potential juror have any feelings based on personal, philosophical, or religious beliefs which might make you unable to render a fair verdict in this case or might make you favor one side over the other in the case?

**JOYE LAW FIRM, L.L.P.**

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North Charleston, South Carolina  
June 11, 2019.

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing instrument was served on the Court and all counsel of  
Record in compliance with the Federal Rules of Civil Procedure this 11<sup>th</sup> day of  
June, 2019.

s/Christopher J. McCool